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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEBYOU SOLOMON, an individual,
Plaintiff,
vs.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT; JOSEPH LOMBARDO, individually and in his official capacity as Sheriff; JOHN L. PELLETIER, an individual; RICHARD E. MAUPIN, an individual; RYAN J. FRYMAN, an individual; JUAN D. CONTRERAS, an individual; ALLEN J. PAVESE, an individual; BRANDON M. MEADS, an individual; FASHION SHOW MALL, LLC, a Nevada limited-liability company; UNIVERSAL PROTECTION SERVICE, LLC, a Nevada limited-liability company; DOE SECURITY GUARDS I – III, individuals,

Case No.: 2:19-cv-00652-JAD-DJA

**STIPULATION AND ORDER TO
EXTEND THE DEADLINE FOR
PLAINTIFF'S RESPONSE TO
DEFENDANT FASHION SHOW
MALL, LLC'S MOTION TO
DISMISS (ECF No. 13)**

(FIRST REQUEST)

ECF No. 21

Pursuant to LR IA 6-1, Plaintiff NEBYOU SOLOMON and Defendant FASHION SHOW MALL, LLC, by and through their respective counsel, hereby stipulate and request that this Court extend the deadline to file the Plaintiff's Response to Defendant Fashion Show Mall LLC's Motion to Dismiss (ECF No. 13) filed on August 29, 2019 by an additional fourteen (14) days, extending the deadline from September 12, 2019 to September 26, 2019. This is the first stipulation for extension of time for Plaintiff to file his Response.

This Request for an extension of time is not sought for any improper purpose or other purpose of delay. This request for extension is based upon the following:

1 Counsel for Plaintiff initiated this request due to numerous competing deadlines,
2 including a court-ordered settlement conference on September 12, 2019 in *Thomas Walker,*
3 *et al. v. City of North Las Vegas, et al.*, U.S. Dist. Court Case No. 2:14-cv-01475; and an
4 evidentiary hearing on September 27, 2019 in *Hickman v. State*, Eighth Judicial Dist. Court
5 Case No. C-12-278699-1. Additionally, the undersigned will be out of the jurisdiction on
6 September 19, 2019 through September 20, 2019 for work on a federal case in the Central
7 District of California. Counsel for Plaintiff also has numerous deadlines in other state court
8 matters which interfere with the preparation of the Responses in this matter.

9 WHEREFORE, the parties respectfully request that this Court extend the deadline
10 to file Plaintiff's Response to Defendant Fashion Show Mall's Motion to Dismiss (ECF No.
11 13) filed on August 29, 2019 to up to and including September 26, 2019.

12 IT IS SO STIPULATED.

13 DATED this 12th day of September, 2019.

14 **MCLEITCHIE LAW**

15 /s/ Margaret A. McLetchie

16 Margaret A. McLetchie, NBN 10931
17 701 E. Bridger Ave., Suite 520
18 Las Vegas, NV 89101
19 Attorney of Plaintiff Neybou Solomon

DATED this 12th day of September, 2019.

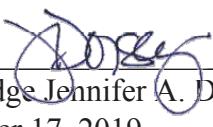
KAEMPFER CROWELL

/s/ Bryan M. Viellion

Anthony J. Celeste, NBN 8776
Bryan M. Viellion, No. 13607
1980 Festival Plaza Dr., Suite 650
Las Vegas, Nevada 89135
Attorneys for Defendant
Fashion Show Mall LLC

20 **ORDER**

21 Based on the stipulation between plaintiff and defendant Fashion Show Mall, LLC
22 [ECF No. 21], which I construe as a joint motion under Local Rule 7-1(c) because it was
23 signed by fewer than all the parties or their attorneys, and with good cause appearing, IT
24 IS HEREBY ORDERED that plaintiff's deadline to respond to Fashion Show Mall
LLC's Motion to Dismiss [ECF No. 13] is extended to September 26, 2019.

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26 
U.S. District Judge Jennifer A. Dorsey
27 Dated: September 17, 2019
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